

## Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	ConocoPhillips Company; Alliance Refinery	AI #:	2418	TEMPO Activity No:	PER20080001
Facility Name:	Unit 1291 – FCCU and Unit 301- Boilers	Remarks Submitted by:	Sage Environmental Consulting, L.P.		
Permit Writer:	Corbet Mathis	Permit Writer Email address:	corbet.mathis@la.gov		

## Instructions

**Permit Reference** – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Condition 120”, or “Section II Air Permits Briefing Sheet”, etc.).

**Remarks** – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information *must be submitted*. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

**DEQ Response** – *DO NOT COMPLETE THIS SECTION*. This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during any required public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Air Permit Briefing Sheet – II. Origin	The December 15, 2008 submittal was a Part 70 permit modification and renewal.	Change Made.
Estimated Emissions in Section III and Emissions Tables	The pollutants Ethylene, Propylene, Anthracene, Benzo(g,h,i)perylene, Bromomethane, Methylene Chloride, and Phenanthrene are missing from the pollutant lists.	Ethylene, Propylene, Bromomethane, and Methylene Chloride are not considered TAPs. Anthracene, Benzo(g,h,i)perylene, and Phenanthrene are included in the PAH total.
Entire permit	Source ID RLP10 should not be in the permit. This source is the same as RLP104 and would create a duplicate.	Two different vents. RLP104 is what we added for this modification.
Entire permit	The description of Source ID RLP104 should not contain “(Start-up/Shutdown)” in the name.	Why is that? RLP104 is ONLY permitted for Start-up/Shutdown emissions, to operated it in any other capacity would be a violation of the permit.
Regulatory Table I	Add the Source ID “UNF 11” to the first column in the first row corresponding to the description “Facility – Unit 1291/301.”	Change Made.
Regulatory Table I	Source IDs EQT 67, EQT 69, and EQT 70 should be marked as applicable to LAC 33:III.Chapter 5.	Change Made.

Regulatory Tables 1 and 2	Source IDs EQT 67, EQT 71, and RLP104 should be marked as Exempt from LAC 33:III.Chapter 15.	Must keep records so exempt would not be correct in this case.
Regulatory Tables 1 and 2	Source ID RLP104 should be marked as Does Not Apply for LAC 33:III.Chapters 11 and 13.	Should be Ch 13 that applies not Ch 11. Ch 13 should have the "1" in table 1.
Regulatory Tables 1 and 2	Source ID EQT 68 should be marked as Does Not Apply for LAC 33:III.2103 and Chapter 51.	Marked "3" in table for 2103. Ch 51 applies so removed it from Table XI.
Regulatory Table 1	Source IDs FUG 7, FUG 8, and RLP104 should be marked as applicable to LAC 33:III.Chapter 51.	Added it for FUG 7 and 8. MACT citation is under RLP 10 instead.
Regulatory Table 1	Facility – Unit 1291/301 is not applicable to 40 CFR 63 Subpart CC. Please remove the "1" indicating applicability.	Change Made.
Regulatory Table 1	Source ID EQT 68 should be marked as Does Not Apply for 40 CFR 60 Subparts K, Ka, and Kb and 40 CFR 61 Subpart Y.	Change Made.
Regulatory Tables 1 and 2	Source ID EQT 71 should be marked as Does Not Apply for 40 CFR 60 Subpart Db.	Db applies to the supplemental boiler.
Regulatory Table 1	Source ID FUG 7 is not applicable to 40 CFR 60 Subpart A. Please remove the "1" indicating applicability.	Change Made.
Regulatory Table 1	Source ID FUG 7 should be marked as Does Not Apply for 40 CFR 63 Subpart H.	Change Made.
Regulatory Tables 1 and 2	Source IDs FUG 7 and FUG 8 should be marked as Does Not Apply for 40 CFR 60 Subpart VV and 40 CFR 61 Subparts J and Y.	Change Made.
Regulatory Table 1	Source ID FUG 8 should be marked as applicable to 40 CFR 60 Subparts GGG and QQQ and 40 CFR 63 Subparts A and CC.	These didn't apply in the previous permits. What has changed?
Regulatory Table 1	Source ID RLP104 should be marked as applicable to 40 CFR 60 Subparts A and J and 40 CFR 63 Subparts A and UVU.	RLP 10 is the appropriate emission point for these regulations.
Regulatory Tables 1 and 2	Source ID RLP104 should be marked as Exempt from 40 CFR 64.	This is already under RLP10.
Regulatory Table 2	The heading for this table should be "Explanation for Exemption Status or Non-Applicability of a Source," not "Explanation from Exemption Status or Non-Applicability or a Source."	Change made.
Regulatory Table 2	Remove the citation suggesting non-applicability of LAC 33:III.1313.C to Source IDs EQT 69 and EQT 70.	Change Made.
General Information	The second half of page 3 and all of pages 4 and 5 are duplicate pages and can be removed.	If any changes are required to the General Information or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-3247 or email your changes to <a href="mailto:facupdate@la.gov">facupdate@la.gov</a>
Inventories	Source IDs EQT 69 and EQT 70 contents should be Refinery Fuel Gas for the operating rates listed in the permit. A separate row should be added for Coke Burn off and FCC Sulfur Feed.	Not really sure what you mean...I think this is beyond the capability of TEMPO.
Inventories	Source ID EQT 71 should have a Normal Operating Rate of 430 MMBTU/hr.	Change Made.
Inventories	Source ID EQT 67 should have a Discharge Area of 56.8 (square feet).	Change Made.
Inventories	The second half of page 2 and all of page 3 are duplicate pages and can be removed.	?

Emission Rates for Criteria Pollutants	The CO average and maximum lb/hr emission rates for Source ID RLP 104 are cut off in the box.	Limitation of the TEMPO form. Nothing can be done to fix this.
Emission Rates for Criteria Pollutants	Source ID EQT 67: The maximum emission rate of CO should be 0.55 lb/hr.	Change Made.
Emission Rates for Criteria Pollutants	The maximum emission rate of CO for Source IDs EQT 69 and 70 should be 379.10 lb/hr as submitted in the Addendum to the Minor Modification and Renewal of Permit # 1810-V2 dated April 23, 2008.	Change Made.
Emission Rates for Criteria Pollutants	The maximum emission rate of NOx for Source IDs EQT 69 and 70 should be 293.80 lb/hr as submitted in the Addendum to the Minor Modification and Renewal of Permit # 1810-V2 dated April 23, 2008.	Change Made.
Specific Requirements # 15 and 41	Source IDs EQT 69 and EQT 70 are not applicable to 40 CFR 63.105(c).	It should be 60.105(c). Change made.
Specific Requirements # 30 and 58	Specific Requirement should be clarified to state that Carbon monoxide <=500 ppmvd at 0% oxygen on a one-hour average basis from the CO Boilers Stack.	This is already done in the requirement. I don't understand what you are asking.
Specific Requirements # 31 and 238	The CO limit of <=100 ppmvd at 0% oxygen on a 365-day rolling average should be clarified that this limit is a combined limit for the CO Boilers stack and the Regenerator Vent stack.	Change Made.
Specific Requirements	Source ID EQT 70 should have the same specific requirement for limiting CO concentration to <= 100 ppmvd at 0% oxygen on a 365-day rolling average as a combined limit for the CO Boilers stack and the Regenerator Vent stack. This is a requirements mandated by the ConocoPhillips Consent Decree. This is the same requirement as Specific Requirements # 31 and 238.	The requirement was there, but from an unknown reason it didn't print out on the form. It seems to be working now.
Specific Requirements	Source IDs EQT 69 and EQT 70 should have applicable requirements for LAC Chapter 11.	Ch 11 doesn't apply since controlling FCCU. Removed "1" from table 1.
Specific Requirements # 69 to 80	Source ID EQT 71 Remove requirements # 69 to 80. 40 CFR 60 Subpart Db does not have requirements for Refinery Fuel Gas and this source is therefore does not apply to the requirements as stated in Table XI Explanation for Exemption or Non Applicability of a Source	Db applies. It is in the PSD Permit.
Specific Requirement # 236	Source ID RLP 104 is not applicable to LAC Chapter 13 requirements.	I don't agree. RLP 104 has PM emissions and Ch 13 applies.
PSD-LA-75 (M-3) Specific Requirement #1	The maximum emission rate of CO for Source ID 1291-H-2/3 should be 0.55 lb/hr.	Change Made.
PSD-LA-75 (M-3) Specific Requirement #1	The maximum emission rate of CO for Source IDs 301-B-2A and 301-B-2B should be 379.10 lb/hr as submitted in the Addendum to the Minor Modification and Renewal of Permit # 1810-V2 dated April 23, 2009.	Change Made.